

1 PILLSBURY WINTHROP SHAW PITTMAN LLP

2 SARAH G. FLANAGAN #70845

3 JACOB R. SORENSEN #209134

4 ROBERT B. BADER #233165

5 50 Fremont Street

6 Post Office Box 7880

7 San Francisco, CA 94120-7880

8 Telephone: (415) 983-1000

9 Facsimile: (415) 983-1200

10 sarah.flanagan@pillsburylaw.com

11

12 Attorneys for Defendants

13 THE BOARD OF TRUSTEES OF THE LELAND

14 STANFORD JUNIOR UNIVERSITY, LAURETTE BEESON,

15 NANCY MORRISON, JODY NYBERG, MARC WAIS and

16 JOHN BRAVMAN

17

18 UNITED STATES DISTRICT COURT

19

20 NORTHERN DISTRICT OF CALIFORNIA

21

22 SAN FRANCISCO DIVISION

23

24 ABE GUPTA,

25 Plaintiff,

26 vs.

27 LAURETTE BEESON, an individual;  
NANCY MORRISON, an individual; JODY  
NYBERG, an individual; JOHN  
BRAVMAN, an individual, LAURETTE  
BEESON AS AN AGENT OF STANFORD  
UNIVERSITY; NANCY MORRISON AS  
AN AGENT OF STANFORD  
UNIVERSITY; JODY NYBERG AS AN  
AGENT OF STANFORD UNIVERSITY;  
MARC WAIS AS AN AGENT OF  
STANFORD UNIVERSITY; JOHN  
BRAVMAN AS AN AGENT OF  
STANFORD UNIVERSITY; STANFORD  
UNIVERSITY, an institution; THE BOARD  
OF TRUSTEES OF THE LELAND  
STANFORD JUNIOR UNIVERSITY, an  
association; THE STANFORD  
UNIVERSITY DEPARTMENT OF PUBLIC  
SAFETY,

28 Defendants.

Case No. C-05-0506 CRB

STIPULATION AND [PROPOSED]  
ORDER DISMISSING JOHN  
BRAVMAN AS DEFENDANT

1 Plaintiff ABE GUPTA and Defendants THE BOARD OF TRUSTEES OF THE  
2 LELAND STANFORD JUNIOR UNIVERSITY (also sued as "STANFORD  
3 UNIVERSITY" and "THE STANFORD UNIVERSITY DEPARTMENT OF PUBLIC  
4 SAFETY"), LAURETTE BEESON, NANCY MORRISON, JODY NYBERG, MARC  
5 WAIS and JOHN BRAVMAN, by and through their counsel of record, enter into the  
6 following stipulation:

7 1. Plaintiff's Second Amended Complaint names John Bravman as a defendant.

8 2. At the hearing on Defendants' Motion to Dismiss Plaintiff's Second  
9 Amended Complaint on October 28, 2005, the Court directed the parties to discuss  
10 dismissing individual defendants from Plaintiff's Second Amended Complaint.

11 3. Plaintiff informed Defendants' counsel that he would stipulate to dismissing  
12 John Bravman as a defendant. Defendants understand that allegations as to John Bravman  
13 acting as an agent of Stanford University would remain as part of Plaintiff's case against  
14 Stanford University.

15 4. It is the desire of all parties that John Bravman be dismissed as a defendant  
16 from this lawsuit.

17

18

19

20

21

22

23

24

25

26

27

28

1 IT IS THEREFORE STIPULATED by Plaintiff and Defendants that, subject to the  
2 approval of the Court, John Bravman be dismissed as a defendant.

3 Dated: November 23, 2005.

4 PILLSBURY WINTHROP SHAW PITTMAN LLP  
5 SARAH G. FLANAGAN  
6 JACOB R. SORENSEN  
7 ROBERT B. BADER  
8 50 Fremont Street  
9 Post Office Box 7880  
San Francisco, CA 94120-7880

7 By \_\_\_\_\_  
8 Sarah G. Flanagan  
9

10 Attorneys for Defendants  
11 THE BOARD OF TRUSTEES OF THE LELAND  
12 STANFORD JUNIOR UNIVERSITY, LAURETTE  
BEESON, NANCY MORRISON, JODY NYBERG,  
MARC WAIS and JOHN BRAVMAN

13 Dated: November 21, 2005.

14 By \_\_\_\_\_  
15 Abe Gupta  
16

17 [PROPOSED] ORDER  
18

19 IT IS HEREBY ORDERED that, pursuant to the foregoing Stipulation among  
20 Plaintiff and counsel for Defendants, John Bravman is dismissed as a defendant from this  
21 lawsuit.

22 Dated: Nov. 29, 2005.

23 \_\_\_\_\_  
24 HON. CHARLES R. BREYER  
25 UNITED STATES DISTRICT JUDGE  
26  
27  
28